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Reply To: Oradell

December 3, 2015

Magistrate Cathy L. Waldor
U.S. District Court
District of New Jersey
Martin Luther King Building &
U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

RE: C.G.B. v. SANTA LUCIA et al
CASE NUMBER: 2:15-CV-03401-SRC-CLW

Your Honor:

I had previously forwarded the attached letter to Mr. Burke asking if this matter could be placed on hold until sometime in February of 2016 as a result of the circumstances set forth in the second paragraph.

My client is not making a good recovery from a surgery and has been distraught since his son's death in September. He is unable to assist me in preparing discovery demands and/or answering discovery forwarded by the plaintiff.

I would respectfully ask for the Court's consideration in having the discovery demands placed on temporary hold until mid-February 2016 at which time I believe my client will be in a better frame of mind and health and be able to assist me.

Thank you for your consideration in this matter.

Respectfully yours,

Paul J. Giblin, Jr.

PJG, JR/sns

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November 11, 2015

Donald F. Burke, Esq.
45 Gale Rd.
Brick, NJ 08723

RE: C.G.B. VS. AIDA SANTA LUCIA, ET ALS.
Case Number: 2:15-CV-03401-SRC-CLW

Dear Mr. Burke:

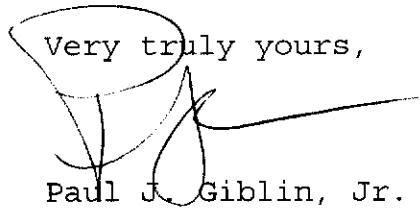
In reference to the above-captioned matter, I had forwarded your interrogatories and discovery demands to my client, Varoujan Khoroziyan.

Unfortunately Mr. Khoroziyan recently underwent surgery for prostate cancer and shortly thereafter tragically lost his 26 year old son on September 18, 2015.

As a result of the above, both matters have taken a significant toll on Mr. Khoroziyan and he is unable to focus and/or assist me in this matter. I am therefore requesting that we agree to place this matter on the inactive list for a period of six months to allow Mr. Khoroziyan to compose himself and be able to assist me in the defense of your claim.

Please advise of your position regarding same prior to me requesting the above relief from the court.

Thank you for your anticipated cooperation and courtesies in this matter.

Very truly yours,

Paul J. Giblin, Jr.

PJG, JR/sns
Enclosures
cc: Clients